

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

No. 1:19-cv-08655 (LGS)(GWG)

**DECLARATION OF SARA B.  
TOMEZSKO IN SUPPORT OF  
MOTION TO RETAIN DOCUMENTS  
UNDER SEAL**

I, SARA B. TOMEZSKO, subject to the penalties by law for perjury, do hereby declare the following to be true and correct on the basis of my personal knowledge. If called upon to do so, I would be competent to testify to the matters set forth in this declaration.

1. I am an associate at Paul Hastings LLP, a member in good standing of the Bar of the State of New York, and outside counsel for Defendant in this matter.

2. Attached to my declaration as Exhibit A are relevant excerpts of correspondence with Plaintiff's counsel identifying confidential documents to be submitted with her January 15, 2021 reply in further support of her pre-motion letter seeking alleged comparator discovery (eventually filed as ECF 97), and Google's response to same.

3. Attached to my declaration as Exhibit B is a true and correct copy of Plaintiff's January 15, 2021 submission to the Court of confidential documents in support of her January 15, 2021 reply (ECF 97). There were ten (10) documents attached to that email:

- a. Pl.'s Exh. 2 – P001584-85, Google's Engineering-Wide Leveling Guide, which Google had previously moved to retain under seal on December 24, 2020, (ECF 85);
- b. Pl.'s Exh. 3 – excerpts from the Deposition of Will Grannis, several pages of which had previously been filed publicly, (*see* ECF 84-1);

- c. Pl.'s Exh. 4 – excerpts from the Deposition of Kevin Lucas, several pages of which had previously been filed publicly, (*see* ECF 84-4);
- d. Pl.'s Exh. 5 – excerpts from the Deposition of Evren Eryurek, several pages of which had previously been filed publicly, (*see* ECF 79-3, 84-18);
- e. Pl.'s Exh. 6 – excerpts from the Deposition of Tariq Shaukat;
- f. Pl.'s Exh. 7 – excerpts from the Deposition of Ben Wilson, several pages of which had previously been filed publicly, (*see* 79-2, 84-12);
- g. Pl.'s Exh. 8 – GOOG-ROWE-00062099-100, a statement of manager support containing confidential information pertaining to a non-party employee's internal transfer process from one role (or "job ladder") to another;
- h. Pl.'s Exh. 10 – GOOG-ROWE-00058834-37, an e-mail containing sensitive business information about potential clients, Google's capabilities and business strategies, as well as private and personal information about a non-party, including medical information about that non-party's parents;
- i. Pl.'s Exh. 12 – GOOG-ROWE-00061497-509, Google's Software Engineering Job Ladder, which Google had already moved to retain under seal on December 24, 2020, (ECF 85); and
- j. Pl.'s Exh. 14 – GOOG-ROWE-00061493-96, which Google had already moved to retain document under seal on December 24, 2020. (ECF 85.)

4. Plaintiff's Exhibits 2, 8, 10, 12, and 14 had been marked "Confidential" by Google under the Stipulated Protective Order for the Treatment of Confidential Information dated February 4, 2020, (ECF 23).

5. Portions of Plaintiff's Exhibit 10 that Google requests remain under seal have been redacted for purposes of this public filing, per Your Honor's Individual Practices, Rule 2.E, and are attached hereto as Exhibit C. An unredacted copy of that document will be submitted to Chambers concurrently with this filing.

**I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES THAT THE FOREGOING IS TRUE AND CORRECT.**

Signed on the 29 day of January, 2021 in Jersey City, New Jersey.

  
Sara Tomezsko